

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department of Telecommunications and Energy on its own D.T.E.
Motion into the Appropriate Pricing, based upon Total Element Long-Run 01-20
Incremental Costs, for Unbundled Network Elements and Combinations of
Unbundled Network Elements, and the Appropriate Avoided Cost Discount for
Verizon New England, Inc. d/b/a Verizon Massachusetts' Resale Services in the
Commonwealth of Massachusetts

**PETITION OF NETWORK ACCESS SOLUTIONS CORPORATION
TO INTERVENE AS LIMITED PARTICIPANT**

Network Access Solutions Corporation ("NAS") hereby petitions, pursuant to 220
C.M.R. § 1.03, to intervene as a limited participant in this docket.

As grounds for this petition, NAS states as follows:

1. NAS will be directly affected by the outcome of the proceeding. The company provides digital subscriber line ("DSL") service in Massachusetts as a competitive telecommunications carrier. It provides DSL service by combining its own facilities with services and facilities obtained from Verizon-Massachusetts (including loop and dedicated transport UNEs). The prices charged by Verizon-Massachusetts for access to UNEs are a key determinant of whether NAS is able to provide DSL service in Massachusetts on economic terms.

2. NAS seeks to intervene as a "limited participant" as that term has been defined by the Commission rather than as a full intervenor.⁽¹⁾ The company requests the right to intervene as a limited participant rather than a full intervenor since, although it wants to remain informed and potentially file briefs, as a small CLEC it cannot justify devoting the resources necessary to participate actively in the adjudicatory phase of this docket.

Respectfully submitted,

NETWORK ACCESS SOLUTIONS CORP.

By _____

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1.

¹ See, e.g., *Hearing Officer Ruling in D.T.E. 98-57, Phase III* at 4 (dated July 11, 2000) (stating that a "limited participant" has a right to receive copies of filings and orders, attend conferences and hearings and file briefs, but no right to participate in discovery or appeal Department rulings).